

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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LEON D. BOROCHOFF, On Behalf of	:	Civil Action No. 1:07-cv-05574-LLS
Himself and All Others Similarly Situated,	:	
	:	<u>CLASS ACTION</u>
Plaintiff,	:	
vs.	:	AFFIDAVIT DAVID A. ROSENFELD IN
	:	SUPPORT OF THE U.K. PENSION FUNDS'
GLAXOSMITHKLINE PLC, et al.,	:	MEMORANDUM OF LAW IN
	:	OPPOSITION TO COMPETING MOTIONS
Defendants.	:	FOR APPOINTMENT AS LEAD
_____	:	PLAINTIFF
	X	

I, DAVID A. ROSENFELD, swear as follows:

1. I am an attorney duly licensed to practice before the courts of the State of New York. I am a member of the law firm of Lerach Coughlin Stoia Geller Rudman & Robbins LLP, counsel for Avon Pension Fund, Administered by Bath & North East Somerset Council and North Yorkshire County Council, Administering Authority for the North Yorkshire Pension Fund (“U.K. Pension Funds”) and proposed lead counsel for the class. I make this declaration in support of the U.K. Pension Funds’ Memorandum of Law in Opposition to Competing Motions for Appointment as Lead Plaintiff. I have personal knowledge of the matters stated herein and, if called upon, I could and would competently testify thereto.

2. Attached are true and correct copies of the following exhibits:

Exhibit A: *In re Parmalat Sec. Litig.*, No. 1:04-cv-0030 (LAK), Amended Order (S.D.N.Y. May 25, 2004);

Exhibit B: *In re Royal Dutch/Shell Transport Sec. Litig.*, No. 04-374 (JWB), Opinion (D.N.J. June 30, 2004); and

Exhibit C: Stuart M. Grant and Diane Zilka, *The Role of Foreign Investors in Federal Securities Class Actions*, Securities Litigation & Enforcement Institute (PLI Corporate Law and Practice 2004).

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed this 27th day of August, 2007, at Melville, New York.

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s/ David A. Rosenfeld  
DAVID A. ROSENFELD

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CERTIFICATE OF SERVICE

I hereby certify that on August 27, 2007, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the e-mail addresses denoted on the attached Electronic Mail Notice List, and I hereby certify that I have mailed the foregoing document or paper via the United States Postal Service to the non-CM/ECF participants indicated on the attached Manual Notice List.

I certify under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on August 27, 2007.

s/ David A. Rosenfeld

DAVID A. ROSENFELD

LERACH COUGHLIN STOIA GELLER

RUDMAN & ROBBINS LLP

58 South Service Road, Suite 200

Melville, NY 11747

Telephone: 631/367-7100

631/367-1173 (fax)

E-mail: drosenfeld@lerachlaw.com

## Mailing Information for a Case 1:07-cv-05574-LLS

### Electronic Mail Notice List

The following are those who are currently on the list to receive e-mail notices for this case.

- **Frederic Scott Fox , Sr**  
ffox@kaplanfox.com
- **Donald R. Hall , Jr**  
dhall@kaplanfox.com
- **Kenneth J. King**  
kingk@pepperlaw.com
- **Sidney Stephen Liebesman**  
sliebesman@gelaw.com,rwittman@gelaw.com
- **Hae Sung Nam**  
hnam@kaplanfox.com
- **David Avi Rosenfeld**  
drosenfeld@lerachlaw.com,e\_file\_ny@lerachlaw.com,amartin@lerachlaw.com

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